## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

ISLAND VIEW CROSSING II, L.P.,

Debtor.

CHAPTER 11 Case No. 17-14454-ELF

**KEVIN O'HALLORAN**, in his capacity as Chapter 11 Trustee for Island View Crossing II, L.P.,

Plaintiff,

v.

PRUDENTIAL SAVINGS BANK,

Defendant.

Adversary No. 17-00202 (ELF)

**Adversary No. 18-00280 (ELF)** 

## PRETRIAL DISCLOSURES OF ISLAND VIEW CROSSING II, L.P. PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(3)

Trustee/Plaintiff Kevin O'Halloran, in his capacity as Chapter 11 Trustee for Island View Crossing II, L.P. ("Plaintiff" or "Island View"), by and through its undersigned counsel, hereby discloses the following information in accordance with Federal Rule of Civil Procedure 26(a)(3):

## 1. Witnesses Whom Plaintiff Expects to Present at Trial<sup>1</sup>

a. Renato J. Gualtieri
 Principal, Founder
 Island View Crossing II, L.P.
 Americorp Homes, Inc.
 One S. State Street
 Newtown, PA 18940

Plaintiff will use deposition testimony for impeachment and may seek to introduce certain deposition testimony in his case in chief should any witness become unavailable.

### b. Kevin O'Halloran

Chapter 11 Trustee for Island View Crossing II, L.P. c/o Kaufman, Coren & Ress, P.C. 2001 Market Street, Suite 3900 Philadelphia, PA 19103

### c. Michael Cordone, Esq.

Stradley, Ronon, Stevens & Young, LLP 2005 Market Street, Suite 2600 Philadelphia, PA 19103

## d. William Sasso, Esq.

Chairman of Management Committee and Board of Directors Stradley, Ronon, Stevens & Young, LLP 2005 Market Street, Suite 2600 Philadelphia, PA 19103

## e. Anthony Migliorino

Executive Vice President, Chief Operating Officer Prudential Savings Bank 93 Fieldview Drive Spring City, PA 19475

### f. Salvatore Fratanduono

Senior Vice President, Chief Lending Officer Prudential Savings Bank (fmr.) 17 La Costa Drive Blackwood, NJ 08012

### g. Nicholas A. DiGianivittorio

First Vice President, Credit Administration, CRA Officer Prudential Savings Bank 9347 Roseto Villa Drive Dublin, OH 43016

## h. Gary Reilly

Senior Vice President, Chief Credit Officer Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

### i. Alexander Nadalini

Chief Credit Officer Prudential Savings Bank (fmr.) 4103 Haddon Drive Greensboro, NC 27406

## j. Joseph Corrato

President, Chief Executive Officer Prudential Savings Bank (ret.) 119 Bellevue Ave. Springfield, PA 19064

## k. Thomas Vento

President, Chief Executive Officer Prudential Savings Bank (ret.) 302 Lake Side Drive Swedesbroro, NJ 08085

## l. David H. Krauter

Vice President, Chief Lending Officer Prudential Savings Bank (fmr.) 221 Ridgewood Road Springfield, PA 19064

## m. Bernie Sauer

Project Manager Island View Crossing II, L.P. (fmr.) Radcliffe Court on the Delaware 1600 Radcliffe Street Bristol Borough, PA 19007

## n. Judy S. Schmitt

Controller Americorp Homes, Inc. One South State Street Newtown, PA 18940

## o. David Nasatir, Esq.

Partner, Business and Finance Department Chair Obermayer, Rebmann, Maxwell & Hippel, LLP Centre Square West 1500 Market Street Philadelphia, PA 19102

## 2. Witnesses Whom Plaintiff May Call If the Need Arises

a. Dennis Pollack
 President, Chief Executive Officer
 Prudential Savings Bank
 1834 West Oregon Avenue
 Philadelphia, PA 19145

## b. Bruce E. MillerChairman of the BoardPrudential Savings Bank1834 West Oregon Avenue

Philadelphia, PA 19145

## c. Douglas J. Smith (deceased)

Senior Vice President, Chief Lending Officer Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

## d. Jack E. Rothkopf

Senior Vice President, Chief Financial Officer, Treasurer Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

## e. Christian Maier

Vice President, Lending/Compliance (fmr.) Prudential Savings Bank 1380 Lake Road Feasterville-Trevose, PA 19053

## f. Jeffrey T. Hanuscin

Vice President, Controller Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

## g. John Barrasso

President Lava Funding, LLC 1205 Delsea Drive Deptford, New Jersey 08093

## h. Nancy Maychuk

Administrative Assistant Americorp Homes, Inc. One South State Street Newtown, PA 18940

## i. Walt Zoladz Purchasing Manager Americorp Homes, Inc.

One South State Street

Newtown, PA 18940

## j. Cheryl Nelson

Island View Crossing II, L.P. (fmr.) 1600 Radcliffe Street Bristol Borough, PA 19007

## k. Jerome R. Balka, Esq.

Partner

Balka and Balka, P.C. (fmr.) Reger, Rizzo & Darnall, LLP 2929 Arch Street, 13th Floor Philadelphia, PA 19104

## l. Michael Kolarik

Commercial Lending Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

## m. Denise Manning-Wilke

Lending Department Prudential Savings Bank 1834 West Oregon Avenue Philadelphia, PA 19145

### n. Robert White

Executive Director Redevelopment Authority of the County of Bucks 216 Pond Street Bristol, PA 19007

### o. Patricia L. Bachtle

Prothonotary, Vice Chairman Redevelopment Authority of the County of Bucks 216 Pond Street Bristol, PA 19007

## p. Gregory Harris Manager Harlyn Consulting 1150 S. Cedar Crest Blvd. Allentown, PA 18103

# q. J.N. Pattison, IV Founding Partner International Consultants, Inc. 432 Pinecrest Road Springfield, PA 19064

# r. Todd Celli Senior Vice President, Field Operations Thomas J. Finn Associates, Inc. P.O. Box 5192 Deptford, NJ 08096

- s. Thomas Petrecz Senior Project Scientist Penn E&R, Inc. 2755 Bergey Road Hatfield, PA 19440
- t. Michael A. Christie, P.G. Penn E&R, Inc. 2755 Bergey Road Hatfield, PA 19440
- u. Joseph S. Baran
  Project Manager
  Bohler Engineering
  1600 Manor Drive, Suite 200
  Chalfont, PA 18914
- v. Brian Brzezinski
  Owner
  Premium Excavating, LLC
  269 Canal Road
  Fairless Hills, PA 19030
- w. Kurt Schroeder
  Construction Services Manager
  Gilmore & Associates, Inc.
  65 E. Butler Avenue, Suite 100
  New Britain, PA 18901

- x. Kevin McGrathMcGrath & Son Homes668 Woodbourne Road, Suite 109Langhorne, PA 19047
- y. Marty Stallone Executive Vice President Metropolitan Companies 2001 State Hill Road, Suite 205 Wyomissing, PA 19610
- z. Michael TulioMetropolitan Companies2001 State Hill Road, Suite 205Wyomissing, PA 19610
- aa. Roy P. Brito, CPA760 Newtown Yardley Road, Suite 124Newtown, PA 18940
- bb. Maureen Mastroieni, MAI, CRE
  President, Real Estate Appraiser & Consultant
  Mastroieni & Associates, Inc.
  1000 Germantown Pike, Unit C-6
  Plymouth Meeting, PA 19562
- cc. James L. Klementisz, Jr. SRA Senior Appraiser, Chief Operating Officer Mastroieni & Associates, Inc. 1000 Germantown Pike, Unit C-6 Plymouth Meeting, PA 19562
- dd. Jeaneen P. Ray
  Certified Real Estate Appraiser and Consultant
  Mastroieni & Associates, Inc.
  1000 Germantown Pike, Unit C-6
  Plymouth Meeting, PA 19562
- ee. Albert F. Laubmeier Laubmeier Valuation Associates 70 West Oakland Avenue, P.O. Box 1366 Doylestown, PA 18901

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3. Designation of Deposition Testimony

Plaintiff hereby identifies (by witness, page and line numbers) portions of deposition

testimony it proposed to offer into evidence on Exhibit A, attached. Plaintiff reserves the right to

supplement and/or amend its deposition designations with any testimony from future depositions

of expert witnesses up until and throughout the time of trial.

4. Exhibits Which Plaintiff Expects to Offer

Plaintiff expects to offer exhibits identified on Exhibit B, attached. Plaintiff reserves the

right to introduce all documents identified in the Schedules and/or Appendixes of Defendant's

Expert Report and any exhibits identified or used in the future depositions of expert witnesses.

Plaintiff reserves the right to supplement and/or amend its exhibit list up until and throughout the

time of trial.

Dated: November 16, 2020

KAUFMAN, COREN & RESS, P.C.

/s/Matthew R. Williams

Steven M. Coren, Esquire

Matthew R. Williams, Esquire

Attorney ID Nos. 32140, 91820

Two Commerce Square, Suite 3900

2001 Market Street

Philadelphia, PA 19103

Telephone: (215) 735-8700

Attorneys for Plaintiff Kevin O'Halloran in his capacity as Chapter 11 Trustee for Island View

Crossing II, L.P.

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## **CERTIFICATE OF SERVICE**

I, Matthew R. Williams, do hereby certify that on November 16, 2020, I caused a true and correct copy of the foregoing Pretrial Disclosures to be served on the following counsel via e-mail and/or first-class mail:

Nicholas Poduslenko, Esq.
OBERMAYER REBMANN
MAXWELL & HIPPELL, LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102

Counsel for Defendants, Prudential Savings Bank

/s/ Matthew R. Williams
MATTHEW R. WILLIAMS